

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

TED ENTERTAINMENT, INC.)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:25-cv-00459-BCW
)	
KACEY CAVINESS, <i>et al.</i> ,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO THE COMPLAINT**

Defendant Kacey Caviness, through undersigned counsel, hereby requests an extension of time to answer or otherwise respond to Plaintiff's Complaint, up to August 15, 2025. Plaintiff consents to the requested extension. In further support of this Motion, Defendant states:

1. Plaintiff filed this action on June 19, 2025. Doc. 1. Defendant was served on June 25, 2025. Doc. 8. Defendant's deadline to respond to the Complaint is currently July 16, 2025.

2. The Complaint is 51 pages long and contains numerous factual allegations. Additionally, a significant legal issue raised by the Complaint—application of the fair use doctrine in relation to so-called “reaction videos” on interactive online media platforms—is a relatively new and emerging area of law.

3. As such, Defendant requires the requested extension to prepare her response to both the factual allegations and in order to adequately address any legal

issues raised in the Complaint which may be appropriately addressed at this stage of the proceeding.

4. Therefore, Defendant respectfully requests an additional thirty (30) days—up to August 15, 2025—to answer or otherwise respond to the Complaint.

5. This request is not made to cause undue delay, but to allow Defendant sufficient time to properly evaluate and respond to the allegations in the Complaint.

6. The requested extension will cause Plaintiff no prejudice, and Plaintiff has consented to the relief requested herein.

WHEREFORE, Defendant Kacey Caviness respectfully requests an extension of time to answer or otherwise respond to the Complaint up to and including August 15, 2025, and for any additional relief the Court finds just and proper.

Respectfully submitted,

**CAPES, SOKOL, GOODMAN &
SARACHAN, P.C.**

By: /s/ Stephen M. Hoeplinger

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Counsel for Defendant Kacey Caviness

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served on all counsel of record via the Court's CM/ECF system on July 14, 2025.

/s/ Stephen M. Hoeplinger